

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CENTRO PRESENTE, a membership organization; HAITIAN-AMERICANS UNITED, INC., a membership organization; JUAN CARLOS VIDAL; ANNE CHRISTINE NICOLAS; CHRIS JEAN BAPTISTE; MERCEDES MATA; CAROLINA MATA; WILL ARIAS; JUAN AMAYA; MARIA GUERRA; JOSUE DORFEUILLE; NATACHA DORFEUILLE; YESY PATRICIA CARBAJAL; JUAN GUERRERO; JAIME YANES; and JOSE OMAR RODRIGUEZ VARELA,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United States in his official capacity; UNITED STATES DEPARTMENT OF HOMELAND SECURITY; KIRSTJEN NIELSEN, Secretary of the Department of Homeland Security in her official capacity; and ELAINE COSTANZO DUKE, Deputy Secretary of the Department of Homeland Security in her official capacity,

Defendants.

CIVIL ACTION NO. 1:18-cv-10340-DJC

**UNOPPOSED MOTION FOR LEAVE TO FILE BRIEF OF AMICI CURIAE IN
SUPPORT OF PLAINTIFFS' OPPOSITION TO THE MOTION TO DISMISS**

The Commonwealth of Massachusetts respectfully requests permission to file the attached multi-state amicus brief in support of Centro Presente's opposition to the Government's Motion to Dismiss. In addition to Massachusetts, the brief is joined by the District of Columbia, California, Connecticut, Delaware, Iowa, Maine, Maryland, Minnesota, New Jersey, New

Mexico, New York, Oregon, Rhode Island, Vermont, Virginia, and Washington (“the Amici States”).

The Amici States are home to hundreds of thousands of individuals with Temporary Protected Status (“TPS”), many of whom have resided in the United States for more than twenty years. TPS has enormously benefited these individuals and their families, neighbors, employers, schools, and communities. DHS’s proposed terminations of TPS would greatly harm these individuals by stripping them of legal status, forcing them to either return to their countries of origin or withdraw into the shadows, working in the underground economy without employer-funded health care and afraid to interface with law enforcement to report crime. This would in turn harm the Amici States’ economy, public health, and public safety. The Amici States therefore have a strong interest in ensuring that DHS’s decisions receive the judicial scrutiny they deserve.

The Amici States’ brief argues that Centro Presente’s claims are reviewable by this court. And it presents a thorough description of the harms that will be suffered by the Amici States unless this Court reverses DHS’s unlawful actions.

The Amici States therefore respectfully request to file the attached brief. Counsel for plaintiffs and defendants consent to the filing of this brief.

Dated: June 22, 2018

Respectfully Submitted,

MAURA HEALEY
Attorney General
Commonwealth of Massachusetts

/s/ Andrew J. Haile
Andrew J. Haile (BBO #694182)
Assistant Attorney General
One Ashburton Place
Boston, MA 02108
(617) 963-2816
Andrew.Haile@state.ma.us

Certificate of Service

I, Andrew J. Haile, hereby certify that a true copy of the above document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: June 22, 2018

/s/ Andrew J. Haile